

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**STIPULATION AND [PROPOSED]
ORDER REGARDING COMPENSATION
INFORMATION FOR META
DEPONENTS**

STIPULATION

The Personal Injury (“PI”), School District and Local Government Entity (“SD”), and Attorney General (“AG”) Plaintiffs (collectively “Plaintiffs”) and Meta (Plaintiffs and Meta together, the “Parties”) hereby stipulate as follows:

1. At the November 21, 2024, Discovery Management Conference, the Court directed the Parties to meet and confer on the deponent compensation dispute. Since then, the Parties have continued to work together on this issue, meeting and conferring to come to a resolution.

2. To that end, the Parties have agreed, pending the Court’s consent, that Meta will conduct a reasonable investigation into whether at any point during the Relevant Time Period (January 1, 2012 through April 1 2024), there was a discrepancy between (a) the Bonus Compensation given to any of the following 11 deponents and (b) the Bonus Compensation Policy Meta has produced to Plaintiffs in discovery in this litigation (META3047MDL-029-00000008-00000011):

- a. M.B
- b. A.D.
- c. W.G.
- d. V.J.
- e. R.S
- f. S.B.
- g. K.J.
- h. K.N.
- i. P.R.
- j. G.R.
- k. M.R.

3. If Meta identifies any such discrepancy in Bonus Compensation for any of the above eleven deponents during the Relevant Time Period, it will notify Plaintiffs’ counsel and will produce documents sufficient to show the total amount(s) of Bonus Compensation Meta provided to that deponent for the bonus period(s) when the discrepancy occurred.

1
2 4. Meta agrees to identify any such discrepancies and produce documents sufficient to show
3 the total Bonus Compensation for each time period where the discrepancy occurred 7 days before any
4 noticed deposition.

5 5. For depositions noticed for less than 14 days from the entry of this order, Meta agrees to
6 identify any such discrepancy and produce documents sufficient to show the total Bonus Compensation
7 for each time period where the discrepancy occurred at least 48 hours ahead of the noticed deposition.

8 6. Where the deposition has already occurred, Meta agrees to identify any discrepancy and
9 produce documents sufficient to show total Bonus Compensation for each time period where the
10 discrepancy occurred within 30 days of the entry of this order.

11 **[PROPOSED] ORDER**

12 7. In accordance with the Parties' stipulated agreement, the Court hereby ORDERS Meta to
13 conduct a reasonable investigation into whether at any point during the Relevant Time Period (January 1,
14 2012 through April 1, 2024), there was a discrepancy between (a) the Bonus Compensation given to any
15 of the following 11 deponents and (b) Meta's Bonus Compensation Policy:

- 16 a. M.B
17 b. A.D.
18 c. W.G.
19 d. V.J.
20 e. R.S
21 f. S.B.
22 g. K.J.
23 h. K.N.
24 i. P.R.
25 j. G.R.
26 k. M.R.

27 8. The Court further ORDERS Meta to identify the fact of any Bonus Compensation
28 discrepancy for the 11 deponents to Plaintiffs' Counsel and to produce documents sufficient to show the

1
2 total amount(s) of the Bonus Compensation for the bonus period(s) when the discrepancy occurred
3 according to the schedule set forth above.

4 **IT IS SO ORDERED.**

5 Dated: December __, 2024

6
7 _____
8 MAGISTRATE JUDGE PETER H. KANG
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 DATED: December 11, 2024

By: /s/

2 LEXI J. HAZAM
3 **LIEFF CABRASER HEIMANN &**
4 **BERNSTEIN, LLP**
5 275 BATTERY STREET, 29TH FLOOR
6 SAN FRANCISCO, CA 94111-3339
7 Telephone: 415-956-1000
8 lhazam@lchb.com

9 PREVIN WARREN
10 **MOTLEY RICE LLC**
11 401 9th Street NW Suite 630
12 Washington DC 20004
13 Telephone: 202-386-9610
14 pwarren@motleyrice.com

15 Co-Lead Counsel

16 CHRISTOPHER A. SEEGER
17 **SEEGER WEISS, LLP**
18 55 CHALLENGER ROAD, 6TH FLOOR
19 RIDGEFIELD PARK, NJ 07660
20 Telephone: 973-639-9100
21 cseeger@seegerweiss.com

22 Counsel to Co-Lead Counsel

23 JENNIE LEE ANDERSON
24 **ANDRUS ANDERSON, LLP**
25 155 MONTGOMERY STREET, SUITE 900
26 SAN FRANCISCO, CA 94104
27 Telephone: 415-986-1400
28 jennie@andrusanderson.com

Liaison Counsel

EMILY C. JEFFCOTT
MORGAN & MORGAN
633 WEST FIFTH STREET, SUITE 2652
LOS ANGELES, CA 90071
Telephone: 213-787-8590
ejeffcott@forthepeople.com

JOSEPH VANZANDT
BEASLEY ALLEN
234 COMMERCE STREET
MONTGOMERY, LA 36103

Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

Federal/State Liaisons

MATTHEW BERGMAN
GLENN DRAPER
SOCIAL MEDIA VICTIMS LAW CENTER
821 SECOND AVENUE, SUITE 2100
SEATTLE, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org
glenn@socialmediavictims.org

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC
700 BROADWAY
NEW YORK, NY 10003
Telephone: 212-558-5500
jbilsborrow@weitzlux.com

JAYNE CONROY
SIMMONS HANLY CONROY, LLC
112 MADISON AVE, 7TH FLOOR
NEW YORK, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

ANDRE MURA
GIBBS LAW GROUP, LLP
1111 BROADWAY, SUITE 2100
OAKLAND, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

ALEXANDRA WALSH
WALSH LAW
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
Telephone: 202-780-3014
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 WALNUT STREET
SUITE 500
PHILADELPHIA, PA 19106

Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN
RON AUSTIN LAW
400 MANHATTAN BLVD.
HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

PAIGE BOLDT
WALSH LAW
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@alexwalshlaw.com

THOMAS P. CARTMELL
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701-1100
tcartmell@wcllp.com

SARAH EMERY
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-600-6725
semery@justicestartshere.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
Telephone: 646-666-8908
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

1 SIN-TING MARY LIU
2 **AYLSTOCK WITKIN KREIS &**
3 **OVERHOLTZ, PLLC**
4 17 EAST MAIN STREET, SUITE 200
5 PENSACOLA, FL 32502
6 Telephone: 510-698-9566
7 mliu@awkolaw.com

8 JAMES MARSH
9 **MARSH LAW FIRM PLLC**
10 31 HUDSON YARDS, 11TH FLOOR
11 NEW YORK, NY 10001-2170
12 Telephone: 212-372-3030
13 jamesmarsh@marshlaw.com

14 JOSEPH E. MELTER
15 **KESSLER TOPAZ MELTZER & CHECK LLP**
16 280 KING OF PRUSSIA ROAD
17 RADNOR, PA 19087
18 Telephone: 610-667-7706
19 jmeltzer@ktmc.com

20 HILLARY NAPPI
21 **HACH & ROSE LLP**
22 112 Madison Avenue, 10th Floor
23 New York, New York 10016
24 Telephone: 212-213-8311
25 hnappi@hrsclaw.com

26 EMMIE PAULOS
27 **LEVIN PAPANTONIO RAFFERTY**
28 316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, PC
1500 ROSECRANS AVE., STE. 500
MANHATTAN BEACH, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600

Encino, CA 91436
Telephone: 818-839-2333
rtellis@baronbudd.com
dfernandes@baronbudd.com

MELISSA YEATES
KESSLER TOPAZ MELTZER & CHECK LLP
280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: 205-855-5700
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership

Attorneys for Individual Plaintiffs

PHILIP J. WEISER

Attorney General
State of Colorado

/s/

Bianca E. Miyata, CO Reg. No. 42012,
pro hac vice
Senior Assistant Attorney General
Lauren M. Dickey, CO Reg. No. 45773, *pro hac vice*
First Assistant Attorney General
Elizabeth Orem, CO Reg. No. 58309
Assistant Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, CO 80203
Phone: (720) 508-6651
bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.
Philip J. Weiser, Attorney General*

ROB BONTA

Attorney General
State of California

/s/

Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
Megan.Oneill@doj.ca.gov

Attorneys for Plaintiff the People of the State of California

RUSSELL COLEMAN

Attorney General
Commonwealth of Kentucky

/s/

J. Christian Lewis (KY Bar No. 87109),

Pro hac vice

Philip Heleringer (KY Bar No. 96748),

Pro hac vice

Zachary Richards (KY Bar No. 99209),

Pro hac vice

Daniel I. Keiser (KY Bar No. 100264),

Pro hac vice

Matthew Cocanougher (KY Bar No. 94292),

Pro hac vice

Assistant Attorneys General

1024 Capital Center Drive, Suite 200

Frankfort, KY 40601

CHRISTIAN.LEWIS@KY.GOV

PHILIP.HELERINGER@KY.GOV

ZACH.RICHARDS@KY.GOV

DANIEL.KEISER@KY.GOV

MATTHEW.COCANOUGH@KY.GOV

Phone: (502) 696-5300

Fax: (502) 564-2698

Attorneys for Plaintiff the Commonwealth of Kentucky

MATTHEW J. PLATKIN

Attorney General
State of New Jersey

/s/

Kashif T. Chand (NJ Bar No. 016752008),

Pro hac vice

Section Chief, Deputy Attorney General

Thomas Huynh (NJ Bar No. 200942017),

Pro hac vice

Assistant Section Chief, Deputy Attorney General

Verna J. Pradaxay (NJ Bar No. 335822021),

Pro hac vice

Mandy K. Wang (NJ Bar No. 373452021),

Pro hac vice

Deputy Attorneys General
New Jersey Office of the Attorney General,
Division of Law
124 Halsey Street, 5th Floor
Newark, NJ 07101
Tel: (973) 648-2052
Kashif.Chand@law.njoag.gov
Thomas.Huynh@law.njoag.gov
Verna.Pradaxay@law.njoag.gov
Mandy.Wang@law.njoag.gov

Attorneys for Plaintiff New Jersey
Division of Consumer Affairs

COVINGTON & BURLING LLP

By: /s/

Ashley M. Simonsen, SBN 275203

COVINGTON & BURLING LLP

1999 Avenue of the Stars

Los Angeles, CA 90067

Telephone: (424) 332-4800

Facsimile: + 1 (424) 332-4749

Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*

Paul W. Schmidt, *pro hac vice*

COVINGTON & BURLING LLP

One City Center

850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: + 1 (202) 662-6000

Facsimile: + 1 (202) 662-6291

Email: pajones@cov.com

Attorney for Defendants Meta Platforms, Inc.

f/k/a Facebook, Inc.; Facebook Holdings,

LLC; Facebook Operations, LLC; Facebook

Payments, Inc.; Facebook Technologies, LLC;

Instagram, LLC; Siculus, Inc.; and Mark Elliot

Zuckerberg